

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. Docket No. 06-61

Respondent: Vincent Woodbury
Title: Director Product Management /
Product Development

REQUEST: CLEC Coalition, Set #3

DATED: August 28, 2006

ITEM: CLEC 3-1 In Verizon's response to CLEC Coalition 1-13(d), Verizon states that "Cost studies are not available for each of the individual service arrangements identified above" (Verizon failed to provide a similar response to 1-12(d) but we assume it would be the same). Since cost studies *per se* are not available, please provide a copy of all financial analyses and supporting Documents used in determining 2005 and 2006 ICB pricing, Facilities Based Pricing or any other customized pricing offered for any business and/or residential services. Verizon should also provide with this response all financial analyses and supporting Documents that demonstrate such prices are consistent with applicable law (including, but not limited to, Massachusetts law or Department Orders or Rules) and do not drop below any applicable price floors. The requested analyses and Documents should be provided in their native software format such as Microsoft Excel or WORD with all formulas and file links intact. The requested analyses and Documents should also reflect any calculations performed by Verizon to ascertain that its pricing meets DTE price floor or imputation requirements.

REPLY: Verizon objects to this Request on the grounds that the request seeks information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this Request on the grounds that information responsive to this request is not readily available in the form requested and would require an overly burdensome special analysis to develop and compile the requested information in the formats requested. Notwithstanding its objection and in an effort to be responsive, Verizon disagrees with the Coalition's characterization of its earlier response and states that the Reply to CLEC 1-12, did not fail to

REPLY: CLEC 3-1
(Cont'd.)

provide a response to 1-12(d). As described therein, there were no FPOs/CSPs provided to residence customers for the requested period and as such, there were no resulting cost studies. CLEC 1-12(b) requested information for business service (Verizon assumed the Coalition intended to indicate residence service and for clarity's sake, referred to the Reply to CLEC 1-13 for information on business service).

Verizon further responds that the pricing analyses and price floors for the FPOs/CSPs, for each filing are proprietary, voluminous and where available, only consist of paper documentation. The documentation will be made available for viewing at Verizon's 125 High Street Boston office, by mutually agreeable appointment, subject to the Protective Agreement.